

**JEFFREY K. STARNES**  
Assistant U.S. Attorney  
U.S. Attorney's Office  
P.O. Box 3447  
Great Falls, MT 59403  
119 First Ave. N., Suite 300  
Great Falls, MT 59401  
Phone: (406) 761-7715  
Fax: (406) 453-9973  
E-mail: jeff.starnes@usdoj.gov

**FILED**

**NOV 23 2021**

Clerk, U.S. District Court  
District Of Montana  
Great Falls

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 21-31-BU-DLC</b>
<b>Plaintiff,</b>	<b>SUPERSEDING INFORMATION</b>
<b>vs.</b>	<b>INTERSTATE COMMUNICATION OF A THREAT</b>
<b>DORA SANDRA GOMEZ, aka Bella Gomez,</b>	<b>Title 18 U.S.C. § 875(c)</b>
<b>Defendant.</b>	<b>(Penalty: Five years of imprisonment, \$250,000 fine, and three years of supervised release)</b>

**THE UNITED STATES ATTORNEY CHARGES:**

That on or about May 8, 2021, at or near Dillon, in Beaverhead County, in the State and District of Montana, the defendant, DORA SANDRA GOMEZ, *aka Bella Gomez*, did knowingly and willfully transmit in interstate commerce from Albuquerque, in the State and District of New Mexico, to Dillon, in the State and

District of Montana, a communication to a secretary at the Frontier Events Center, which was hosting a fundraising banquet for the Montana Trappers Association, which contained a threat to injure another; specifically, defendant GOMEZ stated “people who hate trappers are coming and someone will get hurt,” or words to that effect, and such communication was made with intent to threaten, in violation of 18 U.S.C. § 875(c).

  
JEFFREY K. STARNES  
Assistant U.S. Attorney

  
LEIF M. JOHNSON  
Acting United States Attorney

  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney